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Via CM/ECF

Hon. Kenneth M. Karas The Hon. Charles L. Brieant Jr.

Federal Building and United States Courthouse

300 Quarropas Street, Courtroom 521

White Plains, New York 10601-4150

August 26, 2015

Tranted with the

understanding that no more extensions will The next conference

SU ORDERED

Re:

Vaughn Scott v. City of Mount Vernon, et al., 14-cv-044&b (M)

First Letter-Motion Requesting Extension of Time

Dear Judge Karas,

KENNETH M. KARAS U.S.D.J. 8/26/15

We represent the Defendants in the above-referenced action, and write this letter as the parties' first joint-application for an extension of several discovery deadlines contained in the Court's April 14 Case Management and Scheduling Order (Dkt. No. 5).

The parties respectfully request this extension of time for two main reasons. First, the Defendants just recently received Plaintiff's discovery demands, and are in the process of compiling responsive documents. Secondly, in the wake of Ms. Hina Sherwani departing the Mount Vernon Law Department, the new attorneys handling the matter respectfully request time to adequately review the file.

The current deadlines as reflected in the Case Management and Scheduling Order and proposed new dates are as follows:

Current Deadline

- All Fact Discovery by 8/31/15
- Depositions by 8/31/15
- Status Conference 10/9/15

Proposed New Deadline

All Fact Discovery by 10/30/15 Depositions by 10/30/15 At the Court's convenience

We thank Your Honor for your consideration of the parties' request.

Very truly yours, /s/ Lee B. Gorson Lee B. Gorson (LG0516) **Assistant Corporation Counsel**

(via CM/ECF) cc:

Mr. David Thompson, Esq. Attorneys for Plaintiff